

**IN THE UNITED STATES DISTRICT COURT
DISTRICT SOUTH CAROLINA
COLUMBIA DIVISION**

AMERICAN CIVIL LIBERTIES UNION
FOUNDATION OF SOUTH CAROLINA,

Plaintiff,

v.

BRYAN STIRLING, in his official
capacity as Executive
Director of the South Carolina
Department of Corrections,

Defendant.

Case No. 3:24-cv-906-JDA

**PLAINTIFF'S LOCAL RULE
26.01 INTERROGATORY
RESPONSES**

Plaintiff, by and through its attorneys, hereby respond to Local Rule 26.01
Interrogatories as follows:

A. State the full name, address, and telephone number of all persons or legal entities who may have a subrogation interest in each claim and state the basis and extent of that interest.

RESPONSE: None

B. As to each claim, state whether it should be tried jury or nonjury and why.

RESPONSE: All claims should be tried nonjury.

C. State whether the party submitting these responses is a publicly-owned company and separately identify, (1) any parent corporation and any publicly-held

corporation owning ten percent (10%) or more of the party's stock; (2) each publicly-owned company of which it is a parent and (3) each publicly-owned company in which the party owns ten percent (10%) or more of the outstanding shares.

RESPONSE: Plaintiff is not a publicly-owned company; it has no parent corporations or stock owners; it is not a parent company of any publicly-owned companies; and it does not own shares of any publicly-owned companies.

D. State the basis for asserting the claim in the division in which it was filed (or the basis of any challenge to the appropriateness of the division). *See* Local Civil Rule 3.01 (D.S.C.).

RESPONSE: Venue is proper in the Columbia division under Local Rule 3.01 because that is where the parties reside and where a substantial portion of the events or omissions giving rise to the claims occurred.

E. Is this action related in whole or in part to any other matter filed in this district, whether civil or criminal? If so, provide, (1) a short caption and the full case number of the related action; (2) an explanation of how the matters are related; and (3) a statement of the status of the related action. Counsel should disclose any cases that *may be* related regardless of whether they are still pending. Whether cases *are* related such that they should be assigned to a single judge will be determined by the Clerk of Court based on a determination of whether the cases: arise from the same or identical transactions, happenings, or events; involve the identical parties or property; or for any other reason would entail substantial duplication of labor if heard by different judges.

RESPONSE: This case is related to *Sofia Cano v. Bryan Stirling, et al.*, Civil Action No. 9:22-cv-04247-JDA-MHC. In that matter, Ms. Cano—represented by the Plaintiff here—alleges that the South Carolina Department of Corrections is

violating the Eighth Amendment and Title II of the Americans with Disabilities Act by categorically denying access to hormone therapy and other gender-affirming accommodations. Plaintiff ACLU-SC is counsel for Ms. Cano in the related matter, and here seeks authority to, *inter alia*, publish Ms. Cano's speech about her experience in SCDC custody.

(F) [Defendants only.] If the defendant is improperly identified, give the proper identification and state whether counsel will accept service of an amended summons and pleading reflecting the correct identification.

RESPONSE: Not applicable

(G) [Defendants only.] If you contend that some other person or legal entity is, in whole or in part, liable to you or the party asserting a claim against you in this matter, identify such person or entity and describe the basis of their liability.

RESPONSE: Not applicable

Respectfully submitted,

Date: February 22, 2024

ACLU OF SOUTH CAROLINA

/s Allen Chaney

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* Motions for admission pro hac vice
forthcoming

** Motion for admission pro hac vice
forthcoming; not admitted in DC, practice
limited to federal courts.